



MARIN MUNICIPAL WATER DISTRICT

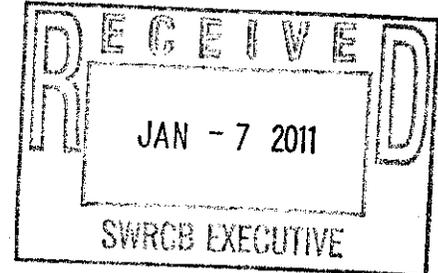
Public Hearing (12/15/10)
CEC - Recycled Water
Deadline: 1/10/11 by 12 noon

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January 7, 2011

Charles Hoppin, Chair And Members of The Board
State Water Resources Control Board
PO Box 100, Sacramento CA 95812-2000

Via electronic mail: commentletters@waterboards.ca.gov



SUBJECT: Comment Letter – CEC Monitoring for Recycled Water

Dear Chairman Hoppin and Members of the Board:

This letter expresses Marin Municipal Water District's comments on the State Water Resources Control Board (Board) staff report, "Constituents of Emerging Concern in Recycled Water" (November 9, 2010). With respect to the many details addressed by the staff report we would refer you to the joint comment letter submitted by ACWA, CASA and the WaterReuse Association that MMWD supports. In addition, I would like to offer the following observations on behalf of Marin Municipal Water District (MMWD).

Marin Municipal Water District has one of the oldest recycled water programs in Northern California with over 350 connections. In an area that is composed of predominantly residential customers, MMWD continues to lead the way in finding alternate uses for recycled water. However, the cost of supplying recycled water far exceeds the revenue. For this reason, it is important to MMWD that all regulatory requirements, including testing for constituents of emerging concern (CECs), should be based on good science and should balance cost versus risk.

In general we agree with the staff report, and support the recommendation that the Board should adopt the findings of the "Blue Ribbon" Science Advisory Panel contained in their report, "Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water" (June 25, 2010). The Panel was convened under the authority of the Board's Recycled Water Policy as a collaborative stakeholder process and as noted in the staff report, the Science Advisory Panel's recommendations reflect the best scientific analysis currently available.

MMWD does *not* support the statement contained in the staff report that surface spreading groundwater recharge/reuse projects should also be required to monitor the additional constituents suggested by the California Department of Public Health (CDPH) in their letter of September 13, 2010. CDPH staff provided no scientific basis for adding these chemicals to the list of monitored CECs, either in their letter or at the Board workshop on December 15, 2010. In contrast the Panel's process for identifying CECs for monitoring is science based. Addition of the CECs requested by CDPH to the list of

Comments on Staff Report, "Constituents of Emerging Concern in Recycled Water"
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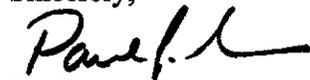
monitored CECs prior to testing them according to the Science Advisory Panel protocol will challenge the validity of the Panel's framework for the selection of CEC's for monitoring and also undermine the collaborative process itself. Precedent might then be set for future additional monitoring requirements to be imposed upon water reuse projects without any rigorous scientific basis. MMWD has similar concern about any direction to the nine Regional Boards to add monitoring requirements to reuse project permits without adequate scientific review.

MMWD would also like to ensure that landscape irrigation is not subjected to unnecessary CEC monitoring. A reference to landscape irrigation in the staff report at the bottom of page 4 is potentially misleading: "*The recommended points of monitoring [...] for a groundwater recharge/reuse or landscape irrigation project*". The inclusion of a reference to landscape irrigation here is inappropriate and MMWD urges the Board to maintain the clarity of the Panel's report regarding the type of projects for which CEC monitoring may be required.

MMWD recommends using the tools outlined in the Panel's report to evaluate treatment plant performance. In the staff report the methods for evaluation of treatment plant performance appear to be somewhat in conflict with the Panel's report. The staff report (page 6) states that the use of health based CECs that are less than 5 times the ratio of MEC/MTL would be a method to determine appropriate recycled water treatment plant performance. The Panel's report does not advocate the use of the MEC/MTL ratio to assess or evaluate treatment plant performance but rather goes into some detail in section 8.3 explaining the use of indicator compounds (which could be CECs) or surrogates to assess treatment performance through removal differential.

As stated in the preamble, the goal of the Board's Recycled Water Policy is "*to increase the use of recycled water and to maximize consistency in the permitting of recycled water projects.*" To this end, we encourage you to adopt the recommendations of the Science Advisory Panel report, "Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water" without modification.

Sincerely,



Paul J. Sellier P.E.
Senior Engineer, Water Quality
Marin Municipal Water District

cc: Dr. David Smith, WateReuse Association, California Section